



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 9, 2022

Thom Fischer, President
Electron Hydro, LLC
1800 James Street, Suite 201
Bellingham, WA 98225-9999

Re: Electron Hydroelectric Project – Hydroelectric Operations Water Quality Monitoring Plan – Compliance with Administrative Order #19624 dated June 8, 2021

Dear Thom Fischer:

Electron Hydro, LLC submitted two drafts of the HOWQMP and received two extensive reviews by Ecology. On January 20, 2022, Electron submitted the third draft of the monitoring plan titled: Hydroelectric Operation Water Quality Monitoring Plan (HOWQMP), January 20, 2022.

Please make the following changes to the attached HOWQMP and provide a final HOWQMP with these additions:

1. Modify the HOWQMP dated January 20, 2022 based on the edits and the conditions stated below:
 - a. Include the figures provided with the Water Quality Management Plan (including all requested edit changes, see enclosed document titled "HOWQMP 01March2022"); and
 - b. Include protocols for toxic substances (Table 1, provided by Ecology) as an attachment to the HOWQMP; and
 - c. Finalize additional changes to the HOWQMP that reflect all conditions below; and
 - d. Resubmit the HOWQMP as a final document; and
2. Monitoring temperature shall begin May 1 and end October 31 of each year, beginning May 1, 2022; and
3. Temperature monitoring locations in the by-pass reach (between the intake and the powerhouse) shall be placed in a location upstream of the confluence in a well-mixed area of the river (for example, right bank confluence with Le Dou Creek tributary – the sample location will be upstream of the confluence within the Puyallup River, outside the influence of the side tributary); and
4. Monitoring turbidity shall occur when the hydroelectric operations reflect a change in turbidity
 - a. Start-up of operations and changes of flow out of the forebay; and
 - b. Drawdowns of the forebay as well as other sediment generating activities; and

Commented [FB(1)]: I found this section to be a little wordy so I tried to simplify.

Commented [FB(2)]: What do you mean by "use"? Are you telling them to include the figures provided in the WQMP?

- c. Cleaning removal of sediment from the penstocks; and
- d. Monitoring must include photo documentation, as well as physical and visual monitoring; and
5. For hydro operations, continuous turbidity monitoring shall occur one day before the sediment generating activities begin through the completed activity, plus additional days if turbidity is suspected to reinitiate; and
6. For in-water construction work, turbidity monitoring will begin 30-minutes prior to in-water activities through the completed activity; and
7. Water quality sampling shall continue until there is sufficient data as stated in the AO:
Monitoring shall continue until continuous data for five (5) years has demonstrated compliance with WQS and Ecology has provided concurrence.
8. Ecology and Electron Hydro, LLC will meet to discuss and review water quality monitoring data annually; and
9. Ecology may ask for source identification monitoring for temperature if there is in exceedance of the temperature criteria in the Water Quality Standards; and
10. Ecology may request changes to monitoring locations based on site conditions and new construction at the intake structure
11. Ecology will have access to all areas of the Project boundary to conduct site visits; and
12. Electron Hydro, LLC will enter data into Ecology's statewide Environmental Information Management System database.

In accordance with the Administrative Order, Electron Hydro, LLC shall resubmit all draft corrections of the HOWQMP within thirty (30) days of Ecology's comments. If you have any questions concerning the approval of Electron's HOWQMP or need additional technical assistance, please contact me at sheila.marcoc@ecy.wa.gov (360) 522-2987 or Anne Baxter at anne.baxter@ecy.wa.gov or (360) 742-9704.

Sincerely,

Sheila Marcoe
Watershed Resources Unit Supervisor
Southwest Regional Office
Water Quality Program

Enclosures: Electron Hydroelectric Operations Water Quality Monitoring Plan, dated January 20, 2022
Comments to associated figures from Electron's Water Quality Management Plan Table 1 (Monitoring in ditches and other water bodies for petroleum), dated March 9, 2022

cc: Sonia Wolfman, AAG

Commented [FB(3)]: Since we reference water quality standards, we don't need to include the duration component 7-DADMax

Commented [FB(4)]: Suggest a sentence or two here that states that this WQMP is approved based on the incorporation of conditions and edits contained herein. Reading it I don't get that the WQMP is being conditionally approved. May want to explicitly state that outright somewhere. It is alluded to in this first sentence but I would have a standalone sentence that makes it clear.

Thom Fischer
March 9, 2022
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Andrew Kolosseus, Ecology, SWRO WQP Section Manager
Anne Baxter, Ecology